

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE; and
MASSACHUSETTS INSTITUTE OF
TECHNOLOGY,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
HOMELAND SECURITY; U.S.
IMMIGRATION AND CUSTOMS
ENFORCEMENT; CHAD F. WOLF, in his
official capacity as Acting Secretary of the
United States Department of Homeland
Security; and MATTHEW ALBENCE, in his
official capacity as Acting Director of U.S.
Immigration and Customs Enforcement,

Defendants.

Civil Action No. 1:20-cv-11283-ADB

**ORAL ARGUMENT SCHEDULED
JULY 14, 2020 3:00 PM**

**NOTICE OF FILING OF DECLARATIONS IN SUPPORT OF
MOTION FOR PRELIMINARY INJUNCTION**

Plaintiffs hereby provide notice to the Court of the filing of declarations in support of Plaintiffs' motion for a preliminary injunction prohibiting Defendants from enforcing the policy announced in U.S. Immigration and Customs Enforcement's July 6, 2020 Directive (ECF No. 30). Plaintiffs file herewith the Supplemental Declaration of Alan M. Garber, the Declaration of Ian A. Waitz, and declarations of students who have not been named to protect their anonymity.

Plaintiffs will address the substance of these declarations in the forthcoming reply brief, which is due by 12:00 p.m. on July 14, 2020 (ECF No. 25), but are filing them today to provide the Court additional time to review the declarations and to allow Defendants sufficient time to

respond. Plaintiffs contacted counsel for Defendants on July 12, 2020 to provide notice that Plaintiffs would file these declarations today.

Dated: July 13, 2020

Respectfully submitted,

/s/ Felicia H. Ellsworth

William F. Lee (BBO #291960)

Mark C. Fleming (BBO #639358)

Felicia H. Ellsworth (BBO #665358)

Michelle Liszt Sandals (BBO #690642)

WILMER CUTLER PICKERING

HALE AND DORR LLP

60 State Street

Boston, MA 02109

Telephone: (617) 526-6000

E-mail: felicia.ellsworth@wilmerhale.com

Seth P. Waxman (*pro hac vice*)

Paul R.Q. Wolfson (*pro hac vice*)

Ari Holtzblatt (*pro hac vice*)

Alex Hemmer (*pro hac vice*)

WILMER CUTLER PICKERING

HALE AND DORR LLP

1875 Pennsylvania Avenue, N.W.

Washington, D.C. 20006

Telephone: (202) 663-6000

Attorneys for Plaintiffs